

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LYNNE FREEMAN,

Plaintiff,

-against-

TRACY DEEBS-ELKENANEY, et al.

Defendants.

Case No. 22-cv-02435 (LLS)(SN)

**PLAINTIFF'S DAUBERT MOTION
TO EXCLUDE A PORTION OF THE
TESTIMONY OF MALCOLM
COULTHARD AND THE
TESTIMONY OF ROSE HILLIARD
IN ITS ENTIRETY**

TO THE HONORABLE COURT, ALL PARTIES, AND COUNSEL OF RECORD:

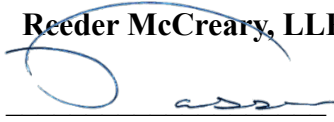
PLEASE TAKE NOTICE THAT, Plaintiff Lynne Freeman, through her undersigned counsel, upon the accompanying Memorandum of Law, Declarations of Carole Chaski and Stephen M. Doniger and Request for Judicial Notice, respectfully moves the Court before the Honorable Sarah Netburn, on a date and time to be designated by the Court, at the United States District Court for the Southern District of New York, 500 Pearl Street, Courtroom 21C, New York, New York 10007, for an order excluding a portion of the testimony of Malcolm Coulthard and testimony of Rose Hilliard in its entirety.

PLEASE TAKE FURTHER NOTICE that Plaintiff respectfully requests oral argument if this motion is opposed pursuant to Section 2.E. of the Court's Individual Rules.

Dated: December 22, 2023
Venice, CA

Respectfully submitted,

By: /s/ Stephen Doniger
Stephen Doniger, Esq.
Scott Alan Burroughs, Esq.
DONIGER / BURROUGHS
247 Water Street, First Floor
New York, New York 10038
(310) 590-1820
stephen@donigerlawfirm.com
scott@donigerlawfirm.com
Attorneys for Plaintiff

Reeder McCreary, LLP
By: 
Mark D. Passin
11766 Wilshire Boulevard,
Suite 1470
Los Angeles, CA 90025
310-861-2475

Attorneys for Plaintiff